

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IRON MOUNTAIN INCORPORATED; )  
et al. )  
Plaintiffs, )  
v. )  
THOMAS CARR, )  
Defendant )  
And ) Civil Action No.  
THOMAS CARR, ) 05 10890 RCL  
Counter-Plaintiff )  
v. )  
IRON MOUNTAIN INCORPORATED; )  
et al. )  
Counter-Defendants )

DEFENDANT AND COUNTER-PLAINTIFF THOMAS CARR'S  
MOTION FOR LEAVE TO FILE REPLY

Thomas Carr, Defendant and Counter-Plaintiff in the above-captioned proceedings, pursuant to Local Rule 7.1(b)(3) and by and through undersigned counsel, hereby respectfully move this Honorable Court for leave to file a Reply to Plaintiffs' Opposition to Defendant's Motion to Disqualify Counsel.

Plaintiffs and Counter-Defendants' Opposition included four affidavits attached to which were hundreds, if not thousands, of pages of documents, all containing a myriad of allegations and

contentions that Defendant Carr would respectfully request the opportunity to briefly address in a Reply memorandum.

The proposed Reply will not exceed fifteen pages in length and would be submitted within five days of receiving the Court's order granting the relief sought herein.

In addition, pursuant to Local Rule 7.1(a)(2), undersigned counsel hereby certifies that they have conferred with counsel for the Plaintiffs who do not oppose this motion.

August 22, 2005

Respectfully submitted,

By his attorneys,



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**ORDER**

In consideration of Defendant and Counter-Plaintiff Thomas Carr's Motion for Leave to  
File a Reply, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2005 ORDERED:

Defendant and Counter-Plaintiff Thomas Carr's Motion is GRANTED.

**IT IS FURTHER ORDERED** that the Reply be limited to no more than fifteen pages  
and be filed with this Court within five days of Defendant and Counter-Plaintiff's receipt of notice  
of this Order.

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Judge, United States District Court